

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,	§	
	§	
Plaintiffs,	§	
v.	§	Civil Action No. 4:20-cv-00957-SDJ
	§	
GOOGLE LLC,	§	
	§	
Defendant.	§	

EXHIBIT 2 - DEFENDANT GOOGLE'S INITIAL WITNESS LIST

Pursuant to the parties' agreement and proposed stipulation regarding the exchange of pretrial materials, Defendant Google provides below an initial list of all witnesses, whether fact or expert, Google reasonably believes it will or may call to testify in its case-in-chief at trial, either live or by deposition designation, based on the information available to Google at this time.

Google anticipates that it will call the following individuals:

Per Bjorke (Live)

Jim Giles (Live)

Nirmal Jayaram (Live)

Nitish Korula (Live)

Scott Sheffer (Live)

Jason Spero (Live)

Sarah Stefaniu (Live)

Sam Temes (Live)

Michael Baye (Live)

Donna Hoffman (Live)

Paul Milgrom (Live)

Martin Rinard (Live)

In addition, Google may call the following witnesses:

Karin Hennessy (Live)

Tim Lipus (Live)

Jessica Mok (Live) - Subject to Court Rulings

Alexis Shellhammer (Live)

Douglas Skinner (Live) - Subject to Court Rulings

Steven Wiggins (Live) - Subject to Court Rulings

Traci Berreth (Idaho Dept. of Health and Welfare) (By Depo)

Ken Blom (Buzzfeed) (By Depo)

Brian Bumpers (Zulily) (By Depo)

Suzette Cabildo (The Nation) (By Depo)

Amy Corner (American Express) (By Depo)

Brittany Eck (Texas General Land Office) (By Depo)

Omri Farber (Meta) (By Depo)

James Glogovsky (New York Times) (By Depo)

Christopher Hanson (Hanson Law Firm/Hanson Law Office) (By Depo)

Matthew Harrigan (Kinin) (By Depo)

Jeremy Helfand (Disney) (By Depo)

Eric Hochberger (Mediavine) (By Depo)

Julie Kipfer (Montana State University) (By Depo)

Lara Koenig (MiQ) (By Depo)

Brian Kratkiewicz (Arkansas Dept. of Parks, Heritage, & Tourism - CJRW)
(By Depo)

Alexandra Kuchta (Florida Dept. of Environmental Protection) (By Depo)

James LaSalle (By Depo)

Shelly Mellott (Texas Dept. of Motor Vehicles) (By Depo)

Jon Nelson (Missouri Dept. of Transportation) (By Depo)

Todd Parsons (Criteo) (By Depo)

Ryan Pauley (Vox) (By Depo)

Caitlyn Perry (Texas Monthly) (By Depo)

Christopher Pirrone (Gannett) (By Depo)

Greg Poinar (Nike) (By Depo)

Kristine Puckett (Arkansas Dept. of Parks, Heritage, & Tourism) (By Depo)

Jennifer Scheel (Dentsu) (By Depo)

Susan Schiekofer (GroupM) (By Depo)

Dimitrius Smaragdis (Texas General Land Office) (By Depo)

Adam Soroca (Magnite) (By Depo)

David Williams (Utah Office of Tourism) (By Depo)

Elin Alm (North Dakota) (By Depo) - Subject to Court Rulings

Andrew Butler (Florida) (By Depo) - Subject to Court Rulings

Guarionex Diaz (Puerto Rico) (By Depo) - Subject to Court Rulings

Jonathan Farmer (Kentucky) (By Depo) - Subject to Court Rulings

Justin Gordon (Texas) (By Depo) - Subject to Court Rulings

Chuck Harder (Arkansas) (By Depo) - Subject to Court Rulings

Rebecca Hartner (South Carolina) (By Depo) - Subject to Court Rulings

Melanie Hall (Utah) (By Depo) - Subject to Court Rulings

Marie Martin (Utah) (By Depo) - Subject to Court Rulings

John Olson (Idaho) (By Depo) - Subject to Court Rulings

Jeff Pickett (Alaska) (By Depo) - Subject to Court Rulings

Anna Schneider (Montana) (By Depo) - Subject to Court Rulings

Crystal Secoy (Mississippi) (By Depo) - Subject to Court Rulings

Steven Taterka (Indiana) (By Depo) - Subject to Court Rulings

Lucas Tucker (Nevada) (By Depo) - Subject to Court Rulings

Michael Schwalbert (Missouri) (By Depo) - Subject to Court Rulings

Jonathan Van Pattent (South Dakota) (By Depo) - Subject to Court Rulings

Patrick Voelker (Louisiana) (By Depo) - Subject to Court Rulings

Trevor Young (Texas) (By Depo) - Subject to Court Rulings

Any witness that Plaintiffs call live or by deposition